

Recommend the following changes be made to SFAR 73-1:

Change the wording in Section 2, paragraph (a)(1) from "no person may manipulate the controls of a Robinson" to "no person may solo or perform duties as pilot-in-command of a Robinson"; paragraph (a)(2) from "may not manipulate the controls of a Robinson" to "may not solo or perform duties as pilot-in-command of a Robinson". The current rule does not take into consideration training someone with no experience in helicopters. Trying to discuss the safety items needed to be reviewed by the SFAR would be Greek to someone who can hardly recognize a Robinson from a Bell product. It would be safer and more productive to wait until the individual had some flight experience with helicopter flight controls and basic understanding of aerodynamic principles before going into the limitations established in the SFAR. SEE below:

#### Section 2(a)

Section 2. Required training, aeronautical experience, endorsements, and flight review.

##### (a) Awareness Training:

(1) Except as provided in paragraph (a)(2) of this section, no person may solo or perform duties as pilot-in-command of a Robinson model R-22 or R-44 helicopter after March 27, 1995 for the purpose of flight unless the awareness training specified in paragraph (a)(3) of this section is completed and the person's logbook has been endorsed by a certified flight instructor authorized under paragraph (b)(5) of this section.

(2) A person who holds a rotorcraft category and helicopter class rating on their pilot certificate and meets the experience requirements of paragraph (b)(1) or (b)(2) of this section may not solo or perform duties as pilot-in-command of a Robinson model R-22 or R-44 helicopter for the purpose of flight after April 26, 1995 unless the awareness training specified in paragraph (a)(3) of this section is completed and the person's logbook has been endorsed by a certified flight instructor authorized under paragraph (b)(5) of this section.

Recommend changing the flight review requirements from 12 to 24 months for both the R-22 and R-44. The experience requirements in the current SFAR as far as currency in accordance with 14 CFR part 61.57 drives the pilot to maintain a higher level of experience in the R-22/R-44 than other helicopters. Most insurance requirements drive the currency requirements for all helicopters to a higher standard than the current CFRs do anyway. The FAA should establish a minimum standard not a maximum. Allowing the 24 month flight review will not increase the accident rate. Training established by the basic rule ensures training in initial qualification is obtained before functioning as a PIC. See below:

##### (b) Aeronautical Experience:

(1) No person may act as pilot in command of a Robinson model R-22 unless that person:

(ii) has had at least 10 hours dual instruction in the Robinson R-22 and has received an endorsement from a certified flight instructor authorized under paragraph (b)(5) of this section that the individual has been given the training required by this paragraph and is proficient to act as pilot in command of an R-22. Beginning 24 calendar months after the date of the endorsement, the

individual may not act as pilot in command unless the individual has completed a flight review in an R-22 within the preceding 24 calendar months and obtained an endorsement for that flight review.

(2) No person may act as pilot in command of a Robinson R-44 unless that person-

-  
(ii) Has had at least 10 hours dual instruction in a Robinson helicopter, at least 5 hours of which must have been accomplished in the Robinson R-44 helicopter and has received an endorsement from a certified flight instructor authorized under paragraph (b) (5) of this section that the individual has been given the training required by this paragraph and is proficient to act as pilot in command of an R-44. Beginning 24 calendar months after the date of the endorsement, the individual may not act as pilot in command unless the individual has completed a flight review in a Robinson R-44 within the preceding 24 calendar months and obtained an endorsement for that flight review.